

# EXHIBIT D

Tuesday, July 8, 2025 at 1:56:09 PM Eastern Daylight Time

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**Subject:** Re: Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas  
**Date:** Thursday, June 12, 2025 at 2:04:48 PM Eastern Daylight Time  
**From:** Andrew Phillips  
**To:** Leigh S. Montgomery, Jarrett Ellzey  
**CC:** Jeffrey A Neiman, Jason A Mays, Alice Newlin, Tom Kherkher  
**Attachments:** image001.png, image002.png, image003.png, image004.png, image005.jpg, image006.png, image007.png, image008.png, image009.png, image010.png

Leigh,

Following up on my letter from June 6. I have not seen any response.

Andrew C. Phillips  
Managing Partner  
MEIER WATKINS PHILLIPS PUSCH LLP  
919 18<sup>th</sup> St NW, Suite 650  
Washington, DC 20006  
Direct: 847.951.7093  
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**From:** Andrew Phillips <[andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com)>

**Date:** Friday, June 6, 2025 at 1:32 PM

**To:** Leigh S. Montgomery <[Leigh@ellzeylaw.com](mailto:Leigh@ellzeylaw.com)>, Jarrett Ellzey <[jellzey@eksm.com](mailto:jellzey@eksm.com)>

**Cc:** Jeffrey A Neiman <[jneiman@mnrlawfirm.com](mailto:jneiman@mnrlawfirm.com)>, Jason A Mays <[jmays@mnrlawfirm.com](mailto:jmays@mnrlawfirm.com)>, Alice Newlin <[anewlin@eksm.com](mailto:anewlin@eksm.com)>, Tom Kherkher <[tkherkher@eksm.com](mailto:tkherkher@eksm.com)>

**Subject:** Re: Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas

Leigh,

Please see the attached letter regarding Mr. Heikali's and Mr. Holland's subpoena objections.

Andrew C. Phillips

Managing Partner

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919 18<sup>th</sup> St NW, Suite 650

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**From:** Leigh S. Montgomery <[Leigh@ellzeylaw.com](mailto:Leigh@ellzeylaw.com)>

**Date:** Monday, June 2, 2025 at 11:02 PM

**To:** Andrew Phillips <[andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com)>, Jarrett Ellzey <[jellzey@eksm.com](mailto:jellzey@eksm.com)>

**Cc:** Jeffrey A Neiman <jneiman@mnrlawfirm.com>, Jason A Mays <jmays@mnrlawfirm.com>, Alice Newlin <anewlin@eksm.com>, Tom Kherkher <tkherkher@eksm.com>

**Subject:** Re: Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas

Counsel,

See attached Non-Party Holland's and Heikali's objections and responses to Rule 45 document subpoenas.

Leigh S. Montgomery  
Partner



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**From:** Andrew Phillips <[andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com)>

**Date:** Tuesday, May 20, 2025 at 1:54 PM

**To:** "Jarrett L. Ellzey" <[Jarrett@ellzeylaw.com](mailto:Jarrett@ellzeylaw.com)>, Firm <[firm@ellzeylaw.com](mailto:firm@ellzeylaw.com)>

**Cc:** Jeffrey A Neiman <jneiman@mnrlawfirm.com>, Jason A Mays <jmays@mnrlawfirm.com>

**Subject:** Re: Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas

Some people who received this message don't often get email from [andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com). [Learn why this is important](#)  
Thanks Jarrett. Attached are Rule 45 document subpoenas to Mr. Holland and Mr. Heikali.

Andrew C. Phillips  
Managing Partner  
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**From:** Jarrett L. Ellzey <[Jarrett@ellzeylaw.com](mailto:Jarrett@ellzeylaw.com)>

**Date:** Monday, May 19, 2025 at 3:26 PM

**To:** Andrew Phillips <[andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com)>, Firm <[firm@ellzeylaw.com](mailto:firm@ellzeylaw.com)>

**Cc:** Jeffrey A Neiman <[jneiman@mnrlawfirm.com](mailto:jneiman@mnrlawfirm.com)>, Jason A Mays <[jmays@mnrlawfirm.com](mailto:jmays@mnrlawfirm.com)>

**Subject:** Re: Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas

Andrew,

We will accept service of the subpoenas on behalf of Holland and Heikali.

Thank you.

Jarrett L. Ellzey

Partner

Direct Line: 713-554-2376





CIVIL TRIAL LAW

American Board  
of Trial Advocates 

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**From:** Andrew Phillips <[andy.phillips@mwpp.com](mailto:andy.phillips@mwpp.com)>

**Date:** Monday, May 19, 2025 at 1:18 PM

**To:** Firm <[firm@ellzeylaw.com](mailto:firm@ellzeylaw.com)>, Jarrett L. Ellzey <[Jarrett@ellzeylaw.com](mailto:Jarrett@ellzeylaw.com)>

**Cc:** Jeffrey A Neiman <[jneiman@mnrlawfirm.com](mailto:jneiman@mnrlawfirm.com)>, Jason A Mays  
<[jmays@mnrlawfirm.com](mailto:jmays@mnrlawfirm.com)>

**Subject:** Paul v. Findeisen et al., No. 5:24-cv-00717 (W.D. Tex.): Document Subpoenas

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Jarrett,

I represent Logan Paul in his lawsuit against Stephen Findeisen and Coffee Break Productions pending in the Western District of Texas. Defendants have informed us that they intend to take the depositions of Don Holland and Alex Heikali, who I understand you represent, per Defendants' disclosures. We intend to serve subpoenas for documents on Mr. Holland and Mr. Hekaili. Please let me know if you will accept service of those subpoenas.

Andrew C. Phillips

Managing Partner

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